





June 29, 1993

Ms. Catherine Garypie Assistant Regional Counsel Office of Regional Counsel U.S. EPA 77 West Jackson CM-3T Chicago, IL 60604

Dear Ms. Garypie:

As requested in Mr. Thomas Mateer's letter of June 3, 1993, enclosed is the response to "Request for Information Pursuant to Section 104 (e) of CERCLA for the Powell Road Landfill in Huber Heights, Ohio."

If you have any questions feel free to call me at (513) 236-1500.

the enter

Sincerely,

Steven P. Schoenlein Corporate Engineer

SPS:jmh

Enclosure

ANSWERS TO INFORMATION REQUEST

- 1. The persons consulted in the preparation of the answers to these Information Requests are:
 - Mr. Tim Edwards, Accounting Services Manager
 - Mr. Robert Ponikvar, Acting Chief Financial Officer
 - Mr. Dale Baird, Plant Manager
 - Mr. Earl Elston, Plant Manager
 - Ms. Shirley Fecke, Financial Services Accountant
 - Mr. John Mullane, Former Employee
 - Mr. Joe Spatz, Former Employee
 - Mr. Trinidad Ferrel, Former Employee
 - Mr. Tom Lough, Former Employee

Detailed information concerning the above is listed in Attachment A.

2. The documents consulted, examined, or referred are:

Respondent's Accounts Payable files from the beginning of fiscal year 1985 until December 31, 1985. The files for prior years have been discarded.

Respondent's Hazardous Waste Annual Reports for 1981 - 1985.

Respondent's Hazardous Waste Manifests from 1980 - 1985.

Respondent's corporate chemical inventory cards.

Material Safety Data Sheets

- 3. To the best of Respondent's knowledge, there are no other persons able to provide a more detailed or complete response to any Information Request.
- 1. EPA Identification Number is OHD-008-929-408. This ID number is for the Van Dyne Crotty Inc. processing facility at 903 Brandt St., Dayton, Ohio.
- 5. Respondent is not aware of any persons who may have caused the release or threat of release of hazardous substances, pollutants, or contaminants at the Site.

<u>Name</u>		<u>Address</u>	Operating Status
Van Dy	ne Crotty	903 Brandt St. Dayton, OH	Operating
Van Dy	ne Crotty	2240 Richard St. Dayton, OH	Leasing to BTA Enterprises
Van Dy	ne Crotty	1910 Dorothy Lane Kettering, OH	Occupied by Dayton Reliable Tool
Van Dy	ne Crotty	100 Vermont Ave. Dayton, OH	Occupied by Kennedy Ink Co.
Van Dy	ne Crotty	400 Linden Ave. Dayton, OH	Occupied by Supply One
Van Dy	ne Crotty	3110 Kettering Blvd. Moraine, OH	Occupied by LM Berry
Van Dy	ne Crotty	1727 Commerce Rd. Springfield, OH	Occupied by International Steel

7. The persons who may have knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous materials at any of the above facilities are:

Mr. John Mullane

Mr. Joe Spatz

Mr. Tom Lough

Mr. Dale Baird

Mr. Steve Schoenlein

3. Yes.

Respondent's accounting records go back to fiscal year 1985. Attachment B provides answers to questions 8a) through 8f) for nazardous materials used, purchased, stored, transported, or otherwise handled from August 1, 1984 through December 31, 1985.

Respondent has waste (hazardous and non-hazardous) disposal records from 1980 through 1985. Attachment C provides answers to questions 8a) through 8f) for substances disposed from January 1, 1980 through December 31, 1985.

- 9. To the best of Respondent's knowledge, neither the Respondent nor anyone on the Respondent's behalf accepted waste materials for transportation to the Site from any person.
- 10. Respondent has no records or knowledge of having sent materials to the Site. Further, Respondent knows of no persons who may have arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site between January 1, 1959 and Decmeber 31, 1985. Respondent's Accounts Payable records indicate SCA of Dayton and GSX Waste Services were used to transport industrial trash from the Brandt St. and Richard St. locations; however, those records do not indicate the ultimate disposal site. Respondent's Accounts Payable records do not go further back in time than fiscal 1985.
- 11-13. As indicated in the foregoing responses, Respondent has carefully reviewed its past waste handling and disposal practices. To date, Respondent has found nothing to indicate that materials originating at a Respondent facility were disposed of at the Powell Road Landfill. In light of the foregoing, Respondent respectfully suggests it is reasonable and appropriate to not submit the financial documents referenced in Request 11 13. Such information constitutes confidential business records the disclosure of which would impact the Respondent's competitive position.

Please note that Respondent submitted a Freedom of Information Act request on June 1, seeking any documents in the Government's possession that connect Respondent to the Site. Should Respondent obtain any information linking it to the Site, it will re-visit its responses to Requests 11-13 (as well as all other previous responses).

I hope that EPA finds Respondent's position to be acceptable. If the Agency has objections or questions, please contact Respondent.

- 14. This question is not applicable.
- 15. This question is not applicable.
- 16. This question is not applicable.

17. The person designated to receive all future correspondence for Respondent is:

Mr. Steven P. Schoenlein Corporate Engineer Van Dyne Crotty, Inc. P.O. Box 442 Dayton OH 45401

Tel. (513) 236-1500

I hereby certify that in response to EPA's request for information regarding the Powell Road Landfill, Van Dyne Crotty, Inc. has reviewed its historic waste management practices, conducted a thorough record search, and interviewed employees who may have relevant knowledge. The information conveyed in the accompanying letter is true and accurate to the best of my knowledge.

Steven P. Schoenlein Corporate Engineer

Sworn or affirmed to, and subscribed before me, this day of June, 1993

VICKI L. COOPER, Notary Public In and for the State of Ohio My Commission Expires March 28, 1996

ATTACHMENT A

Schoenlein, Steven
Van Dyne-Crotty, Inc.
903 Brandt St
Dayton, OH 45404
1985 - Present, - Corporate Engineer

Edwards, Timothy, Accounting Services Manager Van Dyne-Crotty, Inc. 903 Brandt St Dayton, OH 45404 1985 Supervisor - Cost Accounting

Ponikvar, Robert G, Retired Van Dyne-Crotty, Inc. 903 Brandt St Dayton, OH 45404 1964 Controller 1969 Treasurer 1979 V.P. & Treasurer

Baird, Dale E., Toledo Plant Manager
Van Dyne-Crotty, Inc.
150 Arco Drive
Toledo, OH 43607
1974 Supervisor Trainee
1975 Production Supervisor
1978 Richard St Plant Manager
1979 Brandt St Production Supervisor
1980 Richard St Superintendent
1981 Toledo Plant Manager

Elston, Earl M, Lexington, KY Plant Manager
Van Dyne-Crotty, Inc.
100 Westhamption Dr
Lexington, KY 40511
1979 Richard St Supervisor
1980 Brankdt St Supervisor
1981 Richard St Supervisor
1981 Richard St Supervisor
1982 Delphos Plant Manager

Fecke, Shirley J, Financial Services Accountant
Van Dyne-Crotty, Inc.
903 Brandt St
Dayton, OH 45404
1959 Billing Auditor
1962 Accountant
1965 Assistant Chief Accountant
1969 Chief Accountant

Mullane, John A, Retired Van Dyne-Crotty, Inc. 903 Brandt St Dayton, OH 45404 1963 Dayton Division Production Manager 1975 General Manager, Dayton Division 1976 Management Services Manager 1977 Purchasing Manager 1980 Southern Division Production Manager 1981 Director Corporate Support Services Spatz, Joseph S, Retired Van Dyne-Crotty, Inc. 903 Brandt St Dayton, OH 45404 1960 Dayton Routesalesman 1961 Team Supervisor 1962 Sidney Plant Superintendent 1963 Executive Service Superintendent (Vermont) 1964 Production Special Services Supervisor (Vermont) 1965 Maintenance Supervisor (Richard St) 1968 Maintenance Superintendent (Richard St) 1969 Maintenance Superintendent (Brandt) 1975 Corporate Maintenance Manager 1980 Brandt Production Supervisor 1981 Engineering Services Coordinator Ferrel, Trinidad R, Unemployed Van Dyne-Crotty, Inc. 903 Brandt St Dayton, OH 45404 1982 Brandt Production Supervisor 1983 Richard St Superintendent 1985 Brandt Supervisor Lough, Thomas W. National Linen Lakeland, Fl (lives in Land O Lakes, Fl) Springfield Warehouseman 1964 1964 Springfield Routesalesman 1968 Springfield Sales Rep 1969 Dayton Sales Rep 1970 Indianapolis Sales Rep 1971 Dayton Sales Rep Cincinnati Senior Sales Rep 1972 Toledo Senior Sales Rep 1972 1973 Richard St Production Supervisor 1976 Richard St Plant Manager 1978 Brandt Production Supervisor 1979 Richard St Plant Superintendent

1980 Brandt Superintendent

ATTACHMENT B

Summary of Hazardous Substances Used, Purchased, Stored, or Otherwise Handled

SUBSTANCE: Endure

Chemical Composition: Non-ionic Detergent

Supplier: Diamond Shamrock

How Substance was used: Laundry Detergent

Where Substance was used: Toledo and Delphos, OH plants

Quantity Used (from August 1, 1984 - December 31, 1985): 189,300 pounds

SUBSTANCE: ILF-27T

Chemical Composition: Proprietary Surfactant Mixture of Ethyloxylated Aromatic

Fatty Esters

Supplier: Diamond Shamrock

How Substance was used: Laundry Detergent

Where Substance was used: Delphos, OH plant

Quantity Used (from August 1, 1984 - December 31, 1985): 20,600 pounds

SUBSTANCE: Endurance Plus

Chemical Composition: Proprietary Blend of Aromatic Hydrocarbon, Chlorinated Solvent and Ethyloxylated Alcohols

Supplier: Diamond Shamrock

How Substance was used: Laundry Detergent

Where Substance was used: Toledo and Delphos, OH plants

Quantity Used (from August 1, 1984 - December 31, 1985): 3,074 pounds

SUBSTANCE: Anhydrous Sodium Metasilicate

Chemical Composition: N/A

Supplien: Diamond Shamrock

How Substance was used: Laundry Detergent

Where Substance was used: Toledo and Delphos, OH plants

Quantity Used (from August 1, 1984 - December 31, 1985): 95,100 pounds

SUBSTANCE: BLS-170

Chemical Composition: Sodium Perborate, Mixtures of Alkalies and Soap

Supplient: Diamond Shamrock

How Substance was used: Laundry Detergent

Where Substance was used: Dayton, Toledo, and Delphos, OH plants

Quantity Used (from August 1, 1984 - December 31, 1985): 3,960 pounds

SUBSTANCE: Safety Linen Sour

Chemical Composition: Sodium Bifluoride, Sodium Silicofluoride

Supplier: Diamond Shamrock

How Substance was used: Laundry Sour

Where Substance was used: Toledo and Delphos, OH plants

Quantity Used (from August 1, 1984 - December 31, 1985): 2,400 pounds

SUBSTANCE: Hi-Lite Bleach

Chemical Composition: Sodium Metasilicate, Trichloroisocyanuric Acid

Supplier: Diamond Shamrock

How Substance was used: Laundry Bleach

Where Substance was used: Toledo and Delphos, OH plants

Quantity Used (from August 1, 1984 - December 31, 1985): 4,500 pounds

SUBSTANCE: Kindet

Chemical Composition: Nonylphenol Ethoxylate

Supplier: Diamond Shamrock

How Substance was used: Laundry Detergent

Where Substance was used: Toledo and Delphos, OH plants

Quantity Used (from August 1, 1984 - December 31, 1985): 220 gallons

SUBSTANCE: Clipper Cleaner

Chemical Composition: Petroleum Distillate

Supplier: Diamond Shamrock

How Substance was used: Laundry Additive

Where Substance was used: Delphos, OH plant

Quantity Used (from August 1, 1984 - December 31, 1985): 106 gallons

SUBSTANCE: ILF-14

Chemical Composition: Proprietary Surfactant Mixture of ethyloxylated aromatic

fatty esters

Supplier: Diamond Shamrock

How Substance was used: Laundry Detergent

Where Substance was used: Toledo and Delphos, OH plants

Quantity Used (from August 1, 1984 - December 31, 1985): 605 gallons

SUBSTANCE: Caustic Soda

Chemical Composition: Sodium Hydroxide

Supplier: Diamond Shamrock

How Substance was used: Laundry Detergent

Where Substance was used: Dayton, Toledo and Delphos, OH plants

Quantity Used (from August 1, 1984 - December 31, 1985): 3,000 pounds

SUBSTANCE: Mineral Spirits

Chemical Composition: Aliphatic Petroleum Distillates

Supplier: Ashland Chemical

How Substance was used: Petroleum Drycleaning

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 62,733 gallons

SUBSTANCE: Mineral Seal Oil

Chemical Composition: Aliphatic Petroleum Distillates

Supplier: Ashland Chemical

How Substance was used: Closed Loop Mop Cleaning System

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 16,864 gallons

SUBSTANCE: Factor

Chemical Composition: Silica, Tetra Sodium Pyrophosphate

Supplier: Fabrilife

How Substance was used: Laundry Detergent

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 506,100 pounds

SUBSTANCE: Pierce II

Chemical Composition: Tetra Sodium Pyrophosphate, Sodium Hydroxide

Supplier: Fabrilife

How Substance was used: Laundry Detergent

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 36,500 pounds

SUBSTANCE: Servant

Chemical Composition: Sodium Dichloro Isocyanurate

Supplier: Fabrilife

How Substance was used: Laundry Bleach

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 12,000 pounds

SUBSTANCE: Rebound

Chemical Composition: Sodium Silico Fluoride, Sodium Acidic Fluoride

Supplier: Fabrilife

How Substance was used: Laundry Sour

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 3,000 pounds

SUBSTANCE: Liquid Enhance

Chemical Composition: Isopropyl Alcohol

Supplier: Fabrilife

How Substance was used: Laundry Detergent

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 605 gallons

SUBSTANCE: Nulife

Chemical Composition: Petroleum Distillate, Methyl Isobutyl Ketone,

Dipropylene Glycol Monomethyl Ether, Cyclohexanol

Supplier: Fabrilife

How Substance was used: Laundry Additive

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 30 pounds

SUBSTANCE: Mildupruf

Chemical Composition: N/A

Supplier: Fabrilife

How Substance was used: Laundry Mildewcide

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 55 gallons

SUBSTANCE: Wyandotte 4378 Detergent

Chemical Composition: Alkaline Salts, Synthetic Detergents

Supplier: Van Waters & Rogers

How Substance was used: Laundry Detergent (Continuous Roll Towels)

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 5,400 pounds

SUBSTANCE: Perchloroethylene

Chemical Composition: Tetrachloroethylene

Supplier: McKesson Chemical

How Substance was used: Drycleaning

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 8,876 gallons

SUBSTANCE: Gasoline (Regular)

Chemical Composition: N/A

Supplier: Duncan Oil

How Substance was used: Fleet Fuel

Where Substance was used: Through out Dayton service area

Quantity Used (from August 1, 1984 - December 31, 1985): 77,141 gallons

SUBSTANCE: Gasoline (Unleaded)

Chemical Composition: N/A

Supplier: Duncan Oil

How Substance was used: Fleet Fuel

Where Substance was used: Through out Dayton service area

Quantity Used (from August 1, 1984 - December 31, 1985): 11,398 gallons

SUBSTANCE: Diesel Fuel

Chemical Composition: N/A

Supplier: Duncan Oil

How Substance was used: Fleet Fuel

Where Substance was used: Through out Dayton service area

Quantity Used (from August 1, 1984 - December 31, 1985): 21,191 gallons

SUBSTANCE: Plastisol

Chemical Composition: N/A

Supplier: Union City Industries

How Substance was used: Plastic glove refurbishing

Where Substance was used: Dayton (Richard St.) plant

Quantity Used (from August 1, 1984 - December 31, 1985): 18,000 pounds

SUBSTANCE: Staticol

Chemical Composition: N/A

Supplier: E.J. Thomas

How Substance was used: Petroleum Drycleaning Operation

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 715 gallons

SUBSTANCE: Condisol

Chemical Composition: N/A

Supplier: E.J. Thomas

How Substance was used: Petroleum Drycleaning Operation

Where Substance was used: Dayton plant

Quantity Used (from August 1, 1984 - December 31, 1985): 3,905 gallons

ATTACHMENT C Summary of Generation and Disposal of Wastes Substances

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	<u>1980</u>				
<u>Description</u>	TSDF	Amount	<u>uom</u>		
Waste Petroleum Oil	Westville Oil Co.	7,430	G		
	<u>1981</u>				
<u>Description</u>	TSDF	<u>Amount</u>	<u>UOM</u>		
Waste Petroleum Oil	Westville Oil Co.	284,700	P		
Stoddard Dry Cleaning Separator Sludge	Cecos	20,460	P		
Perchloroethylene Sludge	Cecos	58,740	P		
<u>1982</u>					
<u>Description</u>	TSDF	<u>Amount</u>	<u>uom</u>		
Waste Petroleum Oil	Westville Oil Co.	82,193	P		
Stoddard Dry Cleaning Separator Sludge	Cecos	42,600	P		
Laundry Washroom Trench Sludge	Cecos	31,800	P		

Waste Oil (Non-Haz) Ohio Waste Oil Co. 9,235 G

<u> 1983</u>

<u>Description</u>	TSDF	Amount	<u>uom</u>		
Stoddard Dry Cleaning Separator Sludge	Ecolotec	39,500	P		
Perchlorpethylene Sludge	Ecolotec	9,075	P		
Perchlorpethylene Cartridge Filter Waste	Ecolotec	20,592	P		
Laundry Washroom Sludge	Tricil	54,145	P		
Waste Oil (Non-Haz)	Ohio Waste Oil Co.	46,660	G		
<u>1984</u>					
	<u>1984</u>				
<u>Description</u>	<u>1984</u> <u>TSDF</u>	<u>Amount</u>	<u>uom</u>		
<u>Description</u> Stoddard Dry Cleaning Separator Sludge		<u>Amount</u> 44,550	<u>UOM</u> P		
Stoddard Dry Cleaning	TSDF				
Stoddard Dry Cleaning Separator Sludge Ferchloroethylene	TSDF Ecolotec	44,550	P		
Stoddard Dry Cleaning Separator Sludge Perchlorpethylene Sludge Ferchlorpethylene	TSDF Ecolotec Ecolotec	44,550	P P		

<u>1985</u>

<u>Description</u>	TSDF	<u>Amount</u>	<u>uom</u>
Waste Petroleum Oil	Ecolotec	25,200	G
Stoddard Dry Cleaning Separator Sludge	Ecolotec	46,750	P
Stoddard Filter Trash	Ecolotec	18,700	P
Perchlorcethylene Sludge	Ecolotec	1,650	G
Perchlorcethylene Cartridge Filter Waste	Ecolotec	25,300	P
Laundry Washroom Sludge	Ecolotec	162,800	P
Waste Oil (Non-Haz)	Ohio Waste Oil Co.	19,665	G